

STATE OF MAINE
DEPARTMENT OF TRANSPORTATION

TRANSPORTATION BUILDING

STATE HOUSE STATION 16

AUGUSTA, MAINE

04333-0016

DA



DANA F. CONNORS

Commissioner

March 12, 1993

FHWA-97-2176-16

FHWA Docket No. MC-92-10
Office of the Chief Counsel
Federal Highway Administration
Room 4232, HCC-10
400 Seventh Street S. W.
Washington, DC 20590

To Whom It May Concern:

The following constitutes the Maine Department of Transportation's comments on FHWA Docket Number MC-92-10, which concerns a notice of proposed rulemaking on mandatory minimum training requirements for operators of longer combination vehicles (**LCVs**). This notice was published in the Federal Register of January 15, 1993, pages 4638 to 4640 inclusive.

The notice asked for state responses on thirteen specific questions. Our response follows each question listed below.

1A. Should the definition of LCV that will be used to develop a training requirement be expanded to include vehicles not covered by **ISTEA**?

Response: Yes.

1B. Should vehicles operating under special permit at weights over 80,000 pounds and/or straight trucks pulling single or multiple trailers with overall lengths in excess of 72 feet be included in those vehicles used to establish an LCV training requirement?

Response: Yes.

2. What difficulties would the **ISTEA** definition create, from an enforcement standpoint, in distinguishing which vehicles meet the definition and in determining which drivers must comply with any LCV training requirements?

Response: The current definition is inadequate. A fuller definition is required to further distinguish vehicles.

3. Once the training requirements for LCV drivers are established, what should the **FHWA's** role be in assuring that

DOCKET MC-92-10-15
PAGE 1 OF 3

the training is actually carried out according to the minimum standards?

Response: FHWA should require annual state certification.

4. What standards are necessary to ensure that instructors, who will be the key to the efficiency and effectiveness of the LCV training, have been adequately and properly trained and are carrying out their training responsibilities in an acceptable manner?

Response: Require instructor certification.

5. Should initial licensing of LCV instructors and drivers be accomplished by a Federal or State agency?

Response: States should license with Federal oversight.

6A. Who should have the responsibility for assuring that LCV training requirements are met?

Response: State agencies. Under Maine law, the Board of Commercial Driver Education would probably be responsible in my state.

6B. What documentation should be established to prove to prospective employers that adequate LCV training has been successfully completed by a driver?

Response: Annual certification.

7. Should nonprofit, private organizations, such as PTDA, be authorized to evaluate and certify the adequacy of LCV training programs?

Response: Only at the State's request.

8. What types of LCV driver training programs exist?

Response: Do not have information about programs.

9. Should the implementation of minimum LCV operator training requirements be "phased in" over a certain period?

Response: Yes, over a two year (or more) period. This would allow a reasonable time to conform.

10. Should LCV training be a prerequisite for a double or triple trailer endorsement on a CDL?

Response: Yes.

11. Should all LCV drivers be required to have previous experience with single trailer vehicles?

Response: Yes.

12. How often should LCV training be offered or repeated for both instructors and drivers?

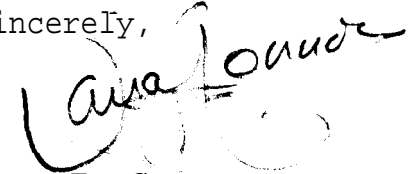
Response: Every ten years.

13. Do specialized vehicle combinations such as triples or those handling special cargo require different training standards?

Response: Yes.

We trust that our responses to this docket will be given due consideration in the framing of the final FHWA rule on LCV training requirements.

Sincerely,


Dana F. Connors
Commissioner

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DOCKET MC-92-10-15
PAGE 3 OF 3